

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

JO-CARROLL ENERGY, INC.,	)	
	)	
Complainant,	)	
	)	
vs.	)	Docket No. 02-0593
	)	
INTERSTATE POWER and LIGHT COMPANY,	)	
	)	
Respondent.	)	

**ANSWERS OF JO-CARROLL ENERGY, INC. TO THE SECOND SET OF DATA  
REQUESTS OF INTERSTATE POWER and LIGHT COMPANY**

JO-CARROLL ENERGY, INC., Complainant, (Jo-Carroll) herewith files its answer to the Second Set of Data Requests filed by Interstate Power and Light Company, Respondent, (Interstate) as follows:

1. In Exhibit 2A attached to Jo-Carroll's Second Supplemental Answers to Interstate's First Set of Data Requests, please describe the facilities that Jo-Carroll intends to use to connect Jo-Carroll's proposed 856 feet extension from point 3 to point 4 and provide supporting work papers.

**Answer:** See the Second Supplemental Answer of Jo-Carroll Energy, Inc. to the First Set of Data Requests filed by Interstate Power and Light Company served upon Interstate's counsel December 19, 2003. Specifically see the response to Interstate's Data Request No. 32. Jo-Carroll intends to connect the endpoint of the Jo-Carroll northerly extension along Indian Ridge Road with a junction box to be located near the Interstate junction box used to serve the customer which distance is 856 feet and the cost to do so is \$4,148.62 as described on the attachments to the foregoing response marked Data Request No. 32. Jo-Carroll will provide additional materials consisting of a junction box (estimated cost \$100.00); cable termination

(estimated cost \$100.00); and a pad mounted transformer (estimated cost \$800.00). In addition, Jo-Carroll will use Interstate's cable subject to Interstate's agreement for which Jo-Carroll estimates the remaining value at \$.85 per foot (estimated cost \$.85 x 862 feet equals \$732.70).

2. Provide a description of the basis on which Jo-Carroll proposes to use facilities owned by Interstate to serve the subject premises located upon the Rowe property, including all substations, transformers, distribution lines, transmission lines, and sources of electric energy, whether by lease, purchase or any other means. Provide the basis for Jo-Carroll to require Interstate to allow the use of Interstate's facilities to serve Jamie Rowe.

**Answer:** Interstate has already installed the facilities from the vicinity of its junction box on Indian Ridge Road to the customer's meter point. Therefore, those facilities usable by Jo-Carroll to wit: the cable, are not necessary to be reconstructed by Jo-Carroll. Further, see Answer of Data Request No. 1 regarding additional items to be provided by Jo-Carroll and cost thereof.

3. Provide an estimate of any additional investment and expense required for Jo-Carroll to extend service to the subject premises through the use of facilities owned by Interstate.

**Answer:** See Answer to Data Request No. 1.

4. Describe what costs related to Jo-Carroll's use of Interstate's facilities were reflected by Jo-Carroll in its estimate in response to Interstate's Data Request 32 to develop the proposed electrical facilities to provide the electric service to the Rowe property. Attache copies of the basis for determining these costs.

**Answer:** No costs were shown by Jo-Carroll with respect to the use of Interstate's

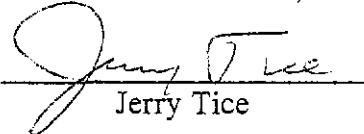
cable from the Indian Ridge Road junction box to the customer's meter point.

5. State the current cost to Jamie Rowe for connection to Jo-Carroll's system.

**Answer:** Jo-Carroll objects to this Data Request for the reason that Section 8 criteria pertain to the supplier's additional investment to provide the service and not the customer's cost. Without waiving such objection, Jo-Carroll states it has not calculated any additional cost anticipated to be incurred by the customer for connection to Jo-Carroll's system for the reason it is as yet unknown what Interstate required the customer to pay Interstate to connect to its system. Further, Jo-Carroll will be using the same route and some Interstate facilities (cable) so that no additional cost would be incurred by the customer.

Respectfully submitted,

JO-CARROLL ENERGY, INC.

By:   
Jerry Tice

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## PROOF OF SERVICE

I, JERRY TICE, hereby certify that on the 9th day of January, 2004, I mailed by federal express at Springfield, Illinois, postage fully paid, a copy of the document attached hereto and incorporated herein, addressed to the following persons at the addresses set opposite their names:

Leslie P. Recht  
Defrees and Fiske  
200 S. Michigan Ave.  
Suite 1100  
Chicago, IL 60604

A handwritten signature in cursive script, reading "Jerry Tice", is written over a horizontal line.

GROSBOLL, BECKER, TICE & REIF

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